

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

DAVID NIEDERST,)	CASE NO.: 1:23-cv-00117-CEF
)	
Plaintiff,)	
)	JUDGE CHARLES ESQUE FLEMING
vs.)	
)	
MINUTEMAN CAPITAL, LLC, <i>et al.</i> ,)	
)	<u>MOTION FOR LEAVE TO PLEAD</u>
Defendants.)	
)	
)	

Now come Defendants Minuteman Capital, LLC, Jonathan Heavey, Dave Altman, Mark Caraway, Graham Gunst, Adam Hudak, Kevin McGinty and David Neudorfer (hereinafter “Defendants”), by and through counsel, and hereby move this Court for an order granting leave of thirty (30) days or until March 20, 2023 to move, plead or otherwise respond to David Neiderst’s (“Plaintiff”) Complaint.

This Motion is sought on the grounds that undersigned counsel has recently been retained, and given the number of defendants, requires more time to form a responsive pleading.

Plaintiff’s counsel was contacted for consent of this filing but has failed to respond.

A proposed Order for such is attached hereto for the Court’s convenience.

Respectfully Submitted,

/s/ Marc Dann

Marc Dann (0039425)

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

/s/ Marc Dann

Marc Dann (0039425)

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Plaintiff,)	
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MINUTEMAN CAPITAL, LLC, <i>et al.</i> ,)	
)	<u>[PROPOSED] ORDER</u>
Defendants.)	
)	
)	
)	

Upon consideration of Defendant's Motion for Leave to Plead, and finding good cause shown for the reasons set forth in the motion, the motion is hereby GRANTED. It is hereby ordered that Defendant may file a responsive pleading on or before March 20, 2023.

IT IS SO ORDERED:

JUDGE